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MEMORANDUM ENDORSED


January 31, 2025

Application granted. The parties' request for an extension of time to submit a deposition designation table that meets the specifications provided in the Court's model deposition-designation spreadsheet, Dkt. No. 477, is granted. The deadline for the parties to submit a table with their designation designations is extended to February 14, 2025. Except as expressly modified by this order, the deadlines set forth in the Court's August 9, 2024 order, Dkt. No. 446, remain in full force and effect.

SO ORDERED.

Hon. Gregory H. Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Dated: January 31, 2025
New York, New York


GREGORY H. WOODS
United States District Judge

**Re: *Novartis Pharma AG v. Incyte Corporation*, No. 1:20-cv-00400-GHW-GWG –
Joint Request for Extension of Time to Submit Deposition Designation Tables**

Dear Judge Woods:

We write on behalf of Plaintiff Novartis International Pharmaceutical AG (“Novartis”) and Defendant Incyte Corporation (“Incyte”) to request an extension of the parties’ deadline to file a deposition designation table that meets the specifications provided in the Court’s model deposition designation spreadsheet, which the parties received on the evening of Thursday, January 30, 2025. The Court’s model deposition designation spreadsheet includes an additional field to include an explanation for each objection in addition to those fields enumerated in Your Honor’s Rule 5(B)(iv). The current deadline for the parties to submit deposition designations and a corresponding deposition designation table is Monday, February 3, 2025.

The parties have been working diligently and collaboratively to prepare their respective deposition designations, counter designations, and objections thereto as directed by, and in compliance with, Your Honor’s Rule 5(B)(iv). However, given the number of witnesses in this case and the resulting volume of deposition designations, the parties require additional time to provide substantive explanations for each identified objection to designations, which also will allow them to reference in their objections the forthcoming motions *in limine*. The parties also will endeavor during this additional time to meet and confer in an attempt to narrow the scope of objections and testimony designated to lessen the burden on the Court.

In light of the foregoing, the parties respectfully request that the Court allow an eleven (11) day extension for the parties to submit their deposition designations and corresponding

deposition designation table in the form of the Court's model deposition designation spreadsheet by Friday, February 14, 2025.

This is the first joint request for an extension of time for the parties' deadlines associated with submitting their joint pretrial order and other submissions permitted or required under Rule 5 of the Court's Individual Rules of Practice in Civil Cases. Both parties consent to this request.

We thank the Court for its consideration of this request.

Respectfully submitted,

KIRKLAND & ELLIS LLP

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Donna Welch

Donna Welch

*Counsel for Plaintiff Novartis International
Pharmaceutical AG*

/s/ Eric Stops

Eric Stops

Counsel for Defendant Incyte Corporation